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June 24, 2016

**VIA E-MAIL TRANSMISSION  
AND ECF FILING**

The Honorable Martin Glenn  
United States Bankruptcy Judge  
United States Bankruptcy Court  
Southern District of New York  
Alexander Hamilton Custom House  
One Bowling Green  
New York, New York 10004

**Re: In re Motors Liquidation Company, et al.  
Case No. 09-50026 (MG)**

**Letter Regarding Update on Motion to  
Enforce Scheduled for Hearing on Monday, June 27, 2016**

Dear Judge Glenn:

King & Spalding LLP is co-counsel with Kirkland & Ellis LLP for General Motors LLC (“**New GM**”) in the above-referenced matter. We write to update the Court on recent events that concern the *Motion by General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Bankruptcy Court’s July 5, 2009 Sale Order and Injunction, and the Rulings in Connection Therewith (Veronica Alaine Fox, Claudia Lemus, Tammie Chapman and Constance Haynes-Tibbetts)* [Dkt. No. 13634] (“**Motion**”), which is scheduled for hearing this Monday, June 27, 2016. The Motion was filed in early June 2016, ahead of other cases involving Post-Closing Accident Plaintiffs without the Ignition Switch Defect, because of the upcoming trial date in the Fox Lawsuit, one of four lawsuits that are the subject of the Motion. The other three lawsuits are filed by the same attorney: the Lemus Lawsuit, the Chapman Lawsuit and the Tibbetts Lawsuit. We note the following:

1. As indicated in the Objection filed by the State Court Plaintiffs and in New GM’s Reply filed yesterday afternoon, the Lemus Lawsuit has been settled and is no longer subject to the Motion.

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2. The Fox Plaintiff filed a letter with the Georgia State Court yesterday (June 23, 2016), attaching a Second Recast & Amended Complaint, which, among other things, strikes any request for punitive damages, and suggests that it would be prepared (subject to certain conditions) to strike its alleged Independent Claim (duty to warn). The Fox Plaintiff's letter and Second Recast & Amended Complaint are annexed hereto, collectively, as **Exhibit "A."** If the Independent Claim is removed, that would resolve the Motion to Enforce relating to the Fox Lawsuit.
3. As indicated in the State Court Plaintiffs' Objection, the Chapman Plaintiff agreed to amend her complaint to address certain (but not all) allegation issues. That First Amended Complaint was filed yesterday, June 23, 2016. A copy of the as-filed version of the Chapman First Amended Complaint is annexed hereto as **Exhibit "B."** The other issues relating to the Chapman Lawsuit, and issues relating to the Tibbetts Lawsuit still need to be resolved by this Court.
4. New GM will be filing today a second Motion to Enforce the Bankruptcy Court rulings in connection with at least 10 other Post-Closing Accident Plaintiffs without the Ignition Switch Defect. There are common issues between the pending Motion to Enforce and the one being filed today. The hearing on this second Motion to Enforce is scheduled for July 18, 2016, and copies of this second Motion will be provided to Chambers by separate cover today. If the Fox Lawsuit would be resolved, that would remove the immediacy of deciding the current Motion to Enforce, ahead of the new one that is being filed today.

Respectfully submitted,

*/s/ Scott Davidson*

Scott Davidson

SD/hs  
Encl.

cc: Edward S. Weisfelner  
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